

The proposal to require broadcasters to record and archive all programs will create a tremendous burden on smaller TV station groups like ours. The burden of capital, manpower, man-hours and archival space would be especially heavy on small TV stations like ours. We are having to invest every profit dollar into the digital conversion to build DTV stations in our three markets. As religious broadcasters with a strong commitment to family values and our communities we serve, it seems unfair to punish us for the actions of a few bad apples. We understand the intentions behind the proposal. We respectfully ask you not to unintentionally suffocate smaller, community-minded broadcasters like us who are struggling to meet the financial demands of the DTV transition.

Sincerely,

Jim Grant  
General Manager/Associate Minister  
VTN (The Victory Television Network)  
KVTN-TV/DT Little Rock, Arkansas  
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